

ROBIN L. HOOTER

CLERK OF COURT ❖ RAPIDES PARISH

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CITATION

NO. 270,938 A

SHELBY CHARRIER ET AL
VERSUS
DG LOUISIANA LLC ET AL

|| NINTH JUDICIAL DISTRICT COURT
|| PARISH OF RAPIDES
|| STATE OF LOUISIANA

TO: DG LOUISIANA LLC
@ CORPORATION SERVICE COMPANY 501 LOUISIANA AVENUE
BATON ROUGE LA 70802-0000
EAST BATON ROUGE PARISH

YOU ARE HEREBY SUMMONED TO COMPLY WITH THE DEMAND CONTAINED IN THE PLEADING(S) FILED IN THE ABOVE ENTITLED AND NUMBERED CAUSE, A DULY CERTIFIED COPY IS ATTACHED AND TO BE SERVED, OR FILE YOUR ANSWER OR OTHER PLEADINGS IN THE OFFICE OF THE CLERK OF THE NINTH JUDICIAL DISTRICT COURT, RAPIDES PARISH, CITY OF ALEXANDRIA, WITHIN FIFTEEN(15) DAYS AFTER SERVICE HEREOF. YOU MAY FILE YOUR WRITTEN ANSWER OR PLEADING IN PERSON OR BY MAIL. IF YOU FILE BY MAIL, THE PLEADING MUST BE RECEIVED BY THE 15TH DAY. YOUR FAILURE TO COMPLY WILL SUBJECT YOU TO THE PENALTY OF ENTRY OF DEFAULT JUDGMENT AGAINST YOU.

WITNESS THE HONORABLES, THE JUDGES OF SAID COURT, AT ALEXANDRIA, LOUISIANA,
THIS 10TH DAY OF JUNE, 2021.

THE FOLLOWING PLEADINGS ARE ATTACHED FOR SERVICE: PETITION FOR DAMAGES.

ROBIN L. HOOTER
Clerk of Court

BY Julie Suarez
Deputy Clerk of Court

W JAY LUNEAU
5208 JACKSON ST
ALEXANDRIA LA 71303-0000
Filing Attorney

SHERIFF STAMP BELOW

CIVIL SUIT NUMBER:

DIVISION “_”

279,938 A

SHELBY CHARRIER AND JOSEPH
CHARRIER

9TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF RAPIDES

DG LOUISIANA, LLC AND DARRELL
LEGGETT

STATE OF LOUISIANA

PETITION FOR DAMAGES

The petition of SHELBY CHARRIER AND JOSEPH CHARRIER, citizens and domiciliaries of the Hineston, Parish of Rapides, and State of Louisiana, with respect represents that:

1.

Made defendants herein is the following:

- A. **DG LOUISIANA, LLC** (hereinafter sometimes referred to as “Dollar General”), a foreign limited liability company, licensed to do and doing business in the State of Louisiana and who may be served through its registered agent for service of process, Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, Louisiana 70802; and
- B. **DARRELL LEGGETT**, a citizen and domiciliary of Woodworth, Rapides Parish, and State of Louisiana, who may be served at 363 Magnolia Drive, Woodworth, Louisiana 71485.

2.

At all times pertinent herein, and specifically on or about June 27, 2020, the date of the accident sued upon herein, defendant, DG Louisiana, LLC was the owner/operator of Dollar General Store #6658, located at 1787 LA-121, Hineston, Louisiana 71438.

3.

On or about June 27, 2020, as petitioner, Shelby Charrier, exited her vehicle in the parking lot of Dollar General Store #6658, she stepped in a hole, which caused her to fall and caused bodily injury.

4.

The aforescribed accident was caused by the fault and negligence of defendant, DG Louisiana, LLC, individually and thru the acts and/or omissions of its employees and/or agents, including defendant, Darrell Leggett, which consisted of the following among other acts or omissions:

- A. Disregarding or failing to repair a defect to the premises of Dollar General Store #6658 about which it knew or should have known;
- B. Failing to warn of a hazardous condition about which it knew or should have known;
- C. Failing to inspect property for defects to property which it owned and over which it had control;
- D. Failing to implement and/or to have in effect proper procedures, protocols, or guidelines to ensure that complaints about property that it owned and over which it had control were responded to in a timely manner; and
- E. Failing to adhere to procedures, protocols, and guidelines regarding inspection, repair, and upkeep of property that it owned and over which it had control.

5.

As a result of the aforescribed accident, petitioner, Shelby Charrier, sustained the following types of damage:

- A. Physical pain and suffering (past, present, and future);
- B. Mental suffering, anxiety, and emotional upset (past, present, and future);
- C. Medical, hospital, and related healthcare expense (past, present, and future); and
- D. Impairment, disability, and loss of enjoyment of life (past, present, and future).

6.

Petitioner, Joseph Charrier, is and was, at all times pertinent herein, the husband of petitioner, Shelby Charrier.

7.

As a result of the aforescribed accident, petitioner, Joseph Charrier, sustained loss or diminution of his wife's association, society, and companionship.

8.

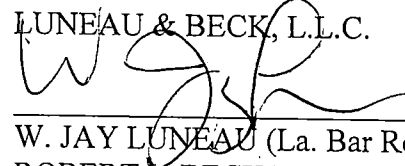
For the above and foregoing reasons, petitioners, Shelby Charrier and Joseph Charrier, claim damages from defendants, DG Louisiana, LLC and Darrell Leggett, jointly and *in solido*, in amounts deemed reasonable and just by this Honorable Court, together with legal interest thereon, from date of judicial demand until paid, together with all costs of these proceedings.

WHEREFORE, PETITIONERS, SHELBY CHARRIER AND JOSEPH CHARRIER, PRAY THAT:

- A. Defendants be served with a copy of this petition and be duly cited to appear and answer same;
- B. After due proceedings had and trial hereof, there be judgment rendered herein and in favor of petitioners, Shelby Charrier and Joseph Charrier, and against defendants, DG Louisiana, LLC and Darrell Leggett, in amounts deemed reasonable and just by this Honorable Court, together with legal interest thereon from date of judicial demand until paid, and for all costs of these proceeding; and
- C. They be granted full, general and equitable relief.

Respectfully submitted,

LUNEAU & BECK, L.L.C.


W. JAY LUNEAU (La. Bar Roll #21731)
ROBERT L. BECK III (La. Bar Roll #29083)
5208 Jackson Street Extension, Suite A
Alexandria, Louisiana 71303
Telephone: (318)445-6581
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ATTORNEYS FOR PLAINTIFFS

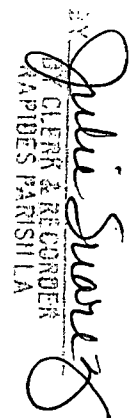
PLEASE SERVE:

DG LOUISIANA, LLC

Through its registered agent for service of process
Corporation Service Company
501 Louisiana Avenue
Baton Rouge, Louisiana 70802

DARRELL LEGGETT

363 Magnolia Drive
Woodworth, Louisiana 71485

FILED & RECORDED
REGINALD HOOTER
CLERK OF COURT
2021 JUN -7 PM 3:35

BY CLERK & RECORDER
RAPIDES PARISH LA

CIVIL SUIT NUMBER: 270,938

DIVISION "A"

SHELBY CHARRIER AND JOSEPH
CHARRIER

9TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF RAPIDES

DG LOUISIANA, LLC AND DARRELL
LEGGETT

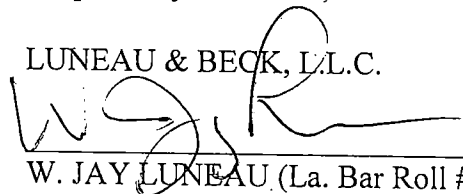
STATE OF LOUISIANA

REQUEST FOR NOTICE

PLEASE TAKE NOTICE that W. Jay Luneau, Robert L. Beck III, and Luneau and Beck, L.L.C., attorneys for plaintiff, do hereby request written notice of the date of trial of the above matter as well as notice of hearings (whether on the merits or otherwise), orders, judgments and interlocutory decrees, and any and all formal steps taken by the parties herein, by the Judge or by any member of Court, as provided in Louisiana Code of Civil Procedure, particularly Articles 1572, 1913 and 1914.

Respectfully submitted,

LUNEAU & BECK, L.L.C.



W. JAY LUNEAU (La. Bar Roll #21731)

ROBERT L. BECK III (La. Bar Roll #29083)

5208 Jackson Street Extension, Suite A

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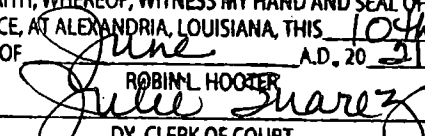
ATTORNEYS FOR PLAINTIFFS

PLEASE SERVE WITH PETITION FOR DAMAGES.

FILED & RECORDED
ROBIN L. HOOTER
CLERK OF COURT
2021 JUN -7 PM 3:35
BY Julie Suarez
CLERK & RECORDIN
RAPIDES PARISH LA.

STATE OF LOUISIANA, PARISH OF RAPIDES
I HEREBY CERTIFY THAT THE ABOVE AND FOREGOING IS
A TRUE AND CORRECT COPY OF THE ORIGINAL ON FILE
AND OF RECORD IN THIS OFFICE.

IN FAITH, WHEREOF, WITNESS MY HAND AND SEAL OF
OFFICE, AT ALEXANDRIA, LOUISIANA, THIS 10th
DAY OF June A.D. 2021

BY 
ROBIN L. HOOTER
DY. CLERK OF COURT